

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ADMIIN INC. d/b/a PARO INC., a Delaware Corporation,)	
)	
)	
Plaintiff,)	Case No. 1:23-cv-04430
)	
v.)	
)	
LUKE KOHAN an individual, and FIRMKEY SOLUTIONS LLC, a Minnesota limited liability company,)	
)	
Defendants.)	

**DEFENDANTS' OPPOSITION
TO PARO'S MOTION TO COMPEL**

Paro has moved to compel to de-designate evidence that this Court has already found to be irrelevant. Its motion should be denied for that reason.

This Court in ruling on Paro's previous motion to compel FirmKey's communications with its experts, denied the motion and held that experts were irrelevant to this case. While the experts may not be confidential, they are irrelevant, as the Court has held, and Paro has no need to know who Defendants' experts are. Defendants reasonably allowed AEO questioning on the issue, but the client itself does not need to know irrelevant information. Additionally, Paro has made the smart decision not to assert a misappropriation of trade secrets claim in its motion for a Preliminary Injunction, making the information even further irrelevant.

Plaintiff's motion regarding FirmKey's experts should be denied.

Date: October 6, 2023

Respectfully submitted,

/s/ Thomas G. Pasternak
Thomas G. Pasternak
Akerman LLP
71 South Wacker Drive

46th Floor
Chicago, IL 60606
Telephone: (312) 634-5700
Facsimile: (312) 424-1900

Attorneys for Defendants,
Luke Kohan and
FirmKey Solutions LLC

CERTIFICATE OF SERVICE

I certify that on October 6, 2023 I filed a true and correct copy of the foregoing **DEFENDANTS' OPPOSITION TO PARO'S MOTION TO COMPEL** with the court using the ECF system, which will provide notice and a copy to counsel of record:

Chad W. Moeller
Sonya Rosenberg
Collette A. Woghiren
NEAL GERBER & EISENBERG LLP
2 N. LaSalle St., Suite 2200
Chicago, IL 60602
cmoeller@nge.com
srosenger@nge.com
cwoghiren@nge.com

/s/ Thomas G. Pasternak
Thomas G. Pasternak